

## SSA EQUALITY IMPACT AND NEEDS ANALYSIS

<b>Directorate</b>	<b>Housing and Regeneration</b>
<b>Service Area</b>	<b>Housing Management</b>
<b>Service/policy/function being assessed</b>	<b>Resident Participation and Consultation Strategy</b>
<b>Which borough (s) does the service/policy apply to</b>	Wandsworth
<b>Staff involved in developing this EINA</b>	<b>Alex Jones and Kay Willman</b>
<b>Date approved by Directorate Equality Group (if applicable)</b>	
<b>Date approved by Policy and Review Manager</b> All EINAs must be signed off by the Policy and Review Manager	
<b>Date submitted to Directors' Board</b>	<b>19<sup>th</sup> October 2023</b>

### 1. Summary

#### **Please summarise the key findings of the EINA.**

This EINA has been produced to support Paper No. 23-370 and the attached draft Resident Participation and Consultation Strategy after a full review of the informal participation routes and the introduction of the new Building Safety chapter (which outlines how residents are engaged in regards to the safety of the building and dwelling), both of which are being reported to the November 2023 Housing Committee. The updated Resident Participation and Consultation Strategy details the Department's objectives and approach to ensuring that there is a robust, inclusive participation structure which encourages resident involvement at all levels.

This Strategy will replace the current strategy which was agreed in 2019. If approved, the draft Strategy will undergo an eight-week consultation. Should no significant amendments be required, approval will be sought to provide the Director of Housing and Regeneration with delegated authority to adopt the Resident Participation and Consultation Strategy to apply from November 2023. The consultation will include all residents in the borough and relevant stakeholders.

The draft Strategy only applies to residents who are in Council-managed properties, which includes all Wandsworth borough Council social housing tenants and leaseholders. One of the principle aims of the Strategy is to ensure that all residents of Council-managed stock have the opportunity to get involved in matters affecting their housing, from one-off events to being an active member of the formal participation structure. Key changes proposed by the draft Strategy include providing more informal routes for participation with the aim to increase overall participation across the borough, particularly in underrepresented areas. Following the introduction of the Building Safety Act (2022) all social housing landlords must also include a strategy on how residents must be engaged on matters relating to the safety of their building, and a new chapter has been introduced detailing the Departments responsibilities on this matter.

The policies and practices in the Strategy will not impact negatively on any groups of people who have one or more protected characteristic, and the broader range of proposed activities aims to increase engagement

across all resident groups by offering a wider variety of means for residents to get involved. The Department also commits to making reasonable adjustments for residents who wish to be engaged in these activities although may have a limitation that prevents them; in such cases, officers will have a chat with the residents to determine what adjustment can be made to ensure no resident is left out.

In addition, RAs, the AHP and BRF are bound by a constitution which prohibits any conduct that discriminates or harasses on the grounds of any protected characteristic and also stipulates making reasonable adjustments as necessary to ensure that activities are accessible to all.

**2. Evidence gathering and engagement.**

**a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand**

Evidence	Source
Borough demographic data of all protected groups	DataWand (ONS Census, 2021)
Data from our internal records	Number of existing Council tenants (by ethnicity, age, disability and gender) as of 31st March 2023.

**b. Who have you engaged and consulted with as part of your assessment?**

Individuals/Groups	Consultation/Engagement results	Date	What changed as a result of the consultation

**3. Analysis of need**

As per the *data gaps* section below, the Department cannot provide comparative data on leaseholders in Council-managed properties and on existing residents who are actively involved in the Department’s participation structures. However, the demographic profile of the Departments social housing tenants can be provided for some of the protected groups listed below. Therefore, although there are some data limitations, this should not hinder the assessment of this EINA since the draft Strategy aims to increase the number of participation routes and improve engagement on building safety to all residents, and this also includes making reasonable adjustments and being flexible to residents regardless of their characteristics.

**Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion**

Protected group	Findings
Age	Tenant profile (as of 31/032023) and resident population (ONS Census 2021):

The Borough-wide population is based on ONS Census 2021 data. The average age of Wandsworth residents is 33 years of age, which is 19 years younger (54 years of age) compared to the average age of a Wandsworth Council tenant. The number of people aged 50 to 64 years rose by just over 11,000 (an increase of 30.6%) in the borough, while the number of residents aged 4 years and under fell by around 3,000 (13.7% decrease). Residents under the age of 35 represent a larger proportion of the Wandsworth Borough (52%) when compared to residents aged 35 +. Although Wandsworth has a higher percentage of young people living within the borough, young people are also less likely to own their own home nor hold a Council tenancy, as shown by the tenant profile in the table below and are therefore less likely to be involved in the resident participation structures as a consequence of this. The population of residents aged 65+ make up 27% of Council tenants although they represent only 9.5% of all residents in the borough, so will have a higher chance of being involved in the Council’s participation structures compared to younger residents.

Age Group	WBC tenant profile		Borough population	
	No. of tenants	% of tenants	No. of residents	% of residents
Under 25	233	1%	88,215	27%
25 to 34	1,682	10%	86,123	24%
35 to 44	3,003	18%	53,880	18%
45 to 54	3,472	21%	39,619	12%
55 to 64	3,745	23%	28,336	8%
65 to 74	2,313	14%	17,381	5%
75+	2,075	13%	13,953	4%
Total	16,523	100%	327,507	100%

**Disability**

Tenant profile (as of 31/03/2023) and resident population (ONS Census 2021):

In 2021, 6.5% of Wandsworth residents were identified as being disabled (ONS Census 2021 data), a decreased from 8.9% in 2011. This was similar to the decrease across London (9.4% to 7.1%) and England (9.1% to 7.5%). As of the 31st March 2023, the percentage difference of all tenants with a disability is higher (12%) to the number of residents in the borough with a disability.

Disability	WBC tenants (%)	WBC residents (%)
No	88%	94%
Yes	12%	7%

**Sex**

Tenant profile (31/03/2023) and resident population (ONS Census 2021):

The majority of tenants are female, representing 67% of all tenants compared to 53% of residents in the Wandsworth borough for this group.

	Sex	WBC tenant profile		Borough population	
		No. of tenants	% of tenants	No. of residents	% of residents
	Female	11,075	67%	172,253	53%
	Male	5,448	33%	155,253	47%
	Total	16,523	100%	327,506	100%
<b>Gender reassignment</b>	<p><u>Resident population (ONS Census 2021):</u></p> <p>The 2021 Census collected data on gender identity for the first time and the question was voluntary and only asked of people aged 16 and above. 254,037 (92.86%) said their gender identity was the same as their sex registered at birth.</p> <p>In total, 1,691 (0.62%) Wandsworth residents indicated a change in gender identity with 713 (0.26%) stating their gender identity was different to that of birth but did not provide a response to what they identified with. Of the 1,690 residents who indicated a change in gender identity, there was an even split between males and females. 347 identified as trans woman and 304 identified as trans man. 182 Wandsworth residents identified as non-binary.</p> <p><u>Tenant profile:</u></p> <p>The Housing and Regeneration Department does not currently hold comparative tenant or applicant data on this group.</p>				
<b>Marriage and civil partnership</b>	<p><u>Resident population (ONS Census 2021):</u></p> <p>Of Wandsworth residents aged 16 years and over, 55.8% said they had never been married or in a civil partnership.</p> <p><u>Tenant profile:</u></p> <p>The Housing and Regeneration Department does not currently hold comparative tenant or applicant data on this group.</p>				
<b>Pregnancy and maternity</b>	<p><u>Resident population:</u></p> <p>In 2020, the birth rate in Wandsworth was 46.5 per 1000 females of childbearing age (15-44 years) (Office of National Statistics 2020).</p> <p><u>Tenant profile:</u></p> <p>The Housing and Regeneration Department does not currently hold comparative tenant or applicant data on this group.</p>				

<b>Race/ethnicity</b>	<p><u>Tenant profile (as of 31/03/2023) and resident population (ONS Census 2021):</u></p> <table border="1" data-bbox="459 271 1509 674"> <thead> <tr> <th rowspan="2">Ethnic Group</th> <th colspan="2">WBC tenant profile</th> <th colspan="2">Borough population</th> </tr> <tr> <th>No. of tenants</th> <th>% of tenants</th> <th>No. of residents</th> <th>% of residents</th> </tr> </thead> <tbody> <tr> <td>Asian</td> <td>1,713</td> <td>10%</td> <td>38,314</td> <td>12%</td> </tr> <tr> <td>Black</td> <td>5,076</td> <td>31%</td> <td>33,062</td> <td>10%</td> </tr> <tr> <td>Mixed</td> <td>544</td> <td>3%</td> <td>20,598</td> <td>6%</td> </tr> <tr> <td>Other</td> <td>719</td> <td>4%</td> <td>13,442</td> <td>4%</td> </tr> <tr> <td>White</td> <td>6,383</td> <td>39%</td> <td>222,090</td> <td>68%</td> </tr> <tr> <td>Unknown</td> <td>2,096</td> <td>13%</td> <td>NA</td> <td>NA</td> </tr> <tr> <td>Total</td> <td>16,531</td> <td>100%</td> <td>327,506</td> <td>100%</td> </tr> </tbody> </table> <p>68% of Wandsworth residents describe themselves as White, compared to 32% of residents who are from Black, Asian and Minority Ethnic backgrounds. 40% of Wandsworth Council tenants describe themselves as White and 47% from Black, Asian and Minority Ethnic backgrounds, meaning based on proportionality alone, tenants from Black, Asian and Minority Ethnic backgrounds are more likely to be involved in Council's participation structures.</p> <p>When looking at each protected group of tenants from Black, Asian and Minority Ethnic backgrounds there are differences between each ethnic group with tenants from the Black ethnic group representing 31% of all Wandsworth Council tenants when compared to the Asian ethnic group who represent 10% of all tenants. Both the Black and Asian ethnic group each represent 11% of all residents in the borough.</p> <p>A full breakdown of the tenant profile by each ethnic group can be found in our annual equalities report (<a href="https://www.wandsworth.gov.uk/housing/about-thehousing-department/housing-and-equalities/">https://www.wandsworth.gov.uk/housing/about-thehousing-department/housing-and-equalities/</a>).</p>	Ethnic Group	WBC tenant profile		Borough population		No. of tenants	% of tenants	No. of residents	% of residents	Asian	1,713	10%	38,314	12%	Black	5,076	31%	33,062	10%	Mixed	544	3%	20,598	6%	Other	719	4%	13,442	4%	White	6,383	39%	222,090	68%	Unknown	2,096	13%	NA	NA	Total	16,531	100%	327,506	100%
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<p><b>Sexual orientation</b></p>	<p><b>Resident population (ONS Census 2021):</b></p> <p>The 2021 Census collected data on sexual orientation for the first time and the question was voluntary and only asked of people aged 16+. 14,148 (5.2%) of 16+ year olds were either gay/lesbian, bisexual or any other sexual orientation. Males were more likely to identify as LGB+ with the majority aged between 25-44 years (higher proportion aged 24-34 years old). In females, the majority of LGB+ were more likely to be aged between 16-34 years (higher proportion aged 25-34 years old).</p> <table border="1" data-bbox="459 701 1241 981"> <thead> <tr> <th>Sexual Orientation</th> <th>No. of residents</th> <th>% of residents</th> </tr> </thead> <tbody> <tr> <td>Straight or Heterosexual</td> <td>236,553</td> <td>86.5%</td> </tr> <tr> <td>Not answered</td> <td>22,821</td> <td>8.3%</td> </tr> <tr> <td>Gay or Lesbian</td> <td>8,342</td> <td>3.0%</td> </tr> <tr> <td>Bisexual</td> <td>4,762</td> <td>1.7%</td> </tr> <tr> <td>All other sexual orientations</td> <td>1,080</td> <td>0.4%</td> </tr> </tbody> </table> <p><u>Tenant profile</u></p> <p>The Housing and Regeneration Department does not currently hold sexual orientation data on tenants.</p>	Sexual Orientation	No. of residents	% of residents	Straight or Heterosexual	236,553	86.5%	Not answered	22,821	8.3%	Gay or Lesbian	8,342	3.0%	Bisexual	4,762	1.7%	All other sexual orientations	1,080	0.4%
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<p><b>Across groups i.e. older LGBT service users or Black, Asian &amp; Minority Ethnic young men.</b></p>	<p>Please see above sections (sexual orientation and race / ethnicity). No available data for this section.</p>																		
<p><b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010)</b>  <b>Include the following groups:</b></p> <ul style="list-style-type: none"> <li>• <b>Deprivation (measured by the 2019 English Indices of Deprivation)</b></li> <li>• <b>Low-income groups &amp; employment</b></li> <li>• <b>Carers</b></li> <li>• <b>Care experienced people</b></li> <li>• <b>Single parents</b></li> </ul>	<p><u>Tenant profile:</u></p> <p>The Housing and Regeneration Department does not currently hold comparative tenant or applicant data on socio-economic status.</p> <p>For a breakdown on the resident borough population based on socio-economic status, refer to the <a href="#">Wandsworth Housing and Homelessness Strategy EINA</a>, published in June 2023.</p>																		

<ul style="list-style-type: none"> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>	
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**Data gaps**

<b>Data gap(s)</b>	<b>How will this be addressed?</b>
Leaseholders – the Council does not hold equalities data on its leaseholders and can therefore not provide comparative analysis for this resident type.	The Council does not collect equality data for its leaseholders and there is currently no plan to commence the collection of leaseholder equality data.
Residents actively involved in the participation structures – the Council does not collect or hold equalities data on residents who are actively involved in the participation structures and can therefore not provide comparative analysis for this resident type.	Equalities monitoring for residents actively involved in our participation structures could commence as long as the data could be kept confidentially and securely. At present, there is no reliable input method to store this data electronically. This issue will be raised to senior staff to determine a plan on how equalities data of actively involved residents can be collected.
As addressed, data on all protected characteristics is not currently collected.	A large proportion of our tenants will have been a tenant of the Council for many years and data is mainly collected once the tenant has signed up to the property. In addition, the Council is mainly collecting data on age, ethnicity, disability and gender, which restricts our ability to provide a richer assessment of other protected groups based on our tenant profile. However, the Housing Services division (covering homelessness and allocations) have begun recording data on religion and sexual orientation, so over time the Department should have a greater capability to report on a higher number of the protected groups.

**4. Impact**

<b>Protected group</b>	<b>Positive</b>	<b>Negative</b>
<b>Age</b>	Although there is a greater percentage of younger residents in the borough, there is also a greater number of older residents who are Council tenants when compared to younger tenants, which could result in a lower percentage of younger tenants engaging via the Council’s participation structures compared to older residents.	No negative impact identified for this particular group.

	<p>The former strategy offered a comprehensive range of participation and engagement opportunities to residents including those aimed at specific age groups, which remains unchanged.</p> <p>To increase the number of young people engaged in the participation structures, the Council has introduced new steps to increase youth engagement and maintains the existing support that is already in place for older residents.</p> <p>Information regarding resident engagement on building safety will also be available via different means to reach all resident types (e.g. notice boards, online and information delivered to residents' doors) to ensure residents of all ages have accessible information and relevant contacts.</p>	
<p><b>Disability</b></p>	<p>The percentage of tenants with a disability is higher than the borough average. This is unsurprising considering those with a disability or vulnerability are more likely to be accepted for social housing.</p> <p>The Resident Participation and Consultation Strategy aims to increase the number of ways for residents to engage with the Council, one of which is staff being more visible in the local neighbourhood and estates, which may increase the chance of disabled tenants being able to engage with the Council since the aim is for engagement to become more localised to residents. The Council can also offer alternative means of engagement via virtual means (e.g. via virtual meetings held via Zoom or online surveys) to mitigate any physical limitations a resident may have.</p>	<p>No negative impact identified for this particular group.</p>



	Information regarding the building safety of our blocks will also be available via different means to reach all resident types (e.g. notice boards, online and information delivered to residents' doors) to ensure residents with any physical limitations have accessible information and relevant contacts.	
<b>Sex</b>	There is a higher percentage of female tenants compared to the borough average, which could result in a higher number of females engaging in the Council's participation structure.	No negative impact identified for this particular group.
<b>Gender reassignment</b>	Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.	No negative impact identified for this particular group.
<b>Marriage and civil partnership</b>	Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.	No negative impact identified for this particular group.
<b>Pregnancy and maternity</b>	Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.	No negative impact identified for this particular group.

<p><b>Race/ethnicity</b></p>	<p>There is a higher proportion of Council tenants from Black, Asian and Minority Ethnic backgrounds (47%) when compared to the whole borough demographic for this group (32%), and a lower proportion of White Council tenants (40%) compared to the whole borough demographic (68%).</p> <p>Considering the higher proportion of Council tenants from Black, Asian and Minority Ethnic backgrounds when compared to the White group, it is expected that a higher proportion of tenants from Black, Asian and Minority Ethnic groups to be involved in the Council's participation structure.</p> <p>Furthermore, the range of participation opportunities are available to residents irrespective of race/ethnicity.</p> <p>Information regarding the building safety of our blocks will also be available via different means to reach all resident types (e.g. notice boards, online and information delivered to residents' doors) and can be translated to any language to ensure residents have accessible information and relevant contacts.</p>	<p>No negative impact identified for this particular group.</p>
<p><b>Religion and belief, including non belief</b></p>	<p>Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.</p>	<p>No negative impact identified for this particular group.</p>
<p><b>Sexual orientation</b></p>	<p>Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.</p>	<p>No negative impact identified for this particular group.</p>

<p><b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010)</b>  <b>Include the following groups:</b></p> <ul style="list-style-type: none"> <li>• <b>Deprivation (measured by the 2019 English Indices of Deprivation)</b></li> <li>• <b>Low-income groups &amp; employment</b></li> <li>• <b>Carers</b></li> <li>• <b>Care experienced people</b></li> <li>• <b>Single parents</b></li> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>	<p>Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.</p>	<p>No negative impact identified for this particular group.</p>
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#### 5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
<p>An annual report analysing equalities data is completed on our tenant profile after the start of a new financial year which is published on the Council website. The annual report provides a breakdown of the tenant profile by age, disability, ethnicity and sex and will be able to identify any negative impact of the proposed change. It is more difficult for the Housing and Regeneration Department to identify a negative impact on the other protected groups due to the reasons as set out above in the Data Gap section, however, the Housing Services division (includes homelessness and allocations) have begun to measure other protected groups such as sexual orientation and religion, and going forward the Department will have larger capacity to start reporting more widely on these groups.</p>	<p>Alex Jones</p>	<p>No deadline – needs further review and consideration</p>

#### 6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation
<p>This EINA will be subject to a public consultation alongside the Housing and Homelessness Strategy</p>	<p>27/11/2023 to 21/01/2024</p>